

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

MASSACHUSETTS NURSES
ASSOCIATION,

Plaintiff,

v.

NORTH ADAMS REGIONAL
HOSPITAL,

Defendant.

Civil Action No. 05-30145-MAP

MOTION FOR LEAVE TO FILE FIRST AMENDED VERIFIED ANSWER

Pursuant to the provisions of Fed. R. Civ. P. 15(a), Defendant North Adams Regional Hospital (the "Hospital") hereby seeks to leave to file its First Amended Verified Answer. Although Plaintiff has refused to assent to this Motion, Defendant submits that the interests of justice require that it be permitted to present all relevant facts in its pleading, verified by an agent of the Hospital with first-hand knowledge of same.

Respectfully Submitted,

NORTH ADAMS REGIONAL HOSPITAL

By its attorneys,

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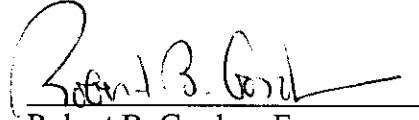
Boston, MA 02110-2624

(617) 951-7000

Dated: August 15, 2005

Certificate of Service

I hereby certify that on August 15, 2005, a true and correct copy of the foregoing document was served upon the attorneys of record, Alan J. McDonald, Esq. and Mark A. Hickernell, Esq., McDonald & Associates, Suite 210, Cordaville Office Center, 153 Cordaville Road, Southborough, MA 01772, by Federal Express.


Robert B. Gordon, Esq.